

EXHIBIT 3 to Supplemental Affidavit of Jeffery D. Ubersax

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Suzanne Genereux, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 04-cv-12137 JLT
)	
American Beryllia Corp., et al.)	
)	
Defendants.)	

**NOTICE OF DEPOSITION OF THE RAYTHEON COMPANY PURSUANT TO
RULE 30(b)(6)**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Brush Wellman Inc. requests that Raytheon Company designate for deposition one or more of its officials, agents, employees, or other persons duly authorized to testify on its behalf, who is or are knowledgeable regarding the following subjects:

1. Raytheon's purchases of beryllium or beryllium-containing products for use at its facility located at 190 Willow Street in Waltham, Massachusetts (the "Waltham Plant") and/or at any other Raytheon facility.
2. Raytheon's purchasing specifications for beryllium-containing products, including specification # 655039.
3. Raytheon's uses of beryllium or beryllium-containing products at the Waltham Plant, and/or at any other Raytheon-owned facility, including but not limited to Machlett Laboratories.

4. Raytheon's manufacture, modification, or alteration of any beryllium or beryllium-containing product at the Waltham Plant, and/or at any other Raytheon facility.
5. U.S. government specifications for or relating to any beryllium-containing products manufactured, modified, altered or used at the Waltham Plant.
6. U. S. government involvement in or supervision of the manufacturing or quality control process for any beryllium-containing product manufactured, modified, altered or used at the Waltham Plant.
7. U.S. government specifications, directions or instructions relating to warnings to be given to Raytheon employees concerning health risks associated with exposure to beryllium.
8. Work performed by Suzanne Genereux and Barry Genereux at the Waltham Plant or any other Raytheon facility.
9. Raytheon's industrial hygiene equipment and policies and practices at the Waltham Plant to protect workers against beryllium exposure, including but not limited to Standard # 37-3066-130, and the glove box and any related ventilation equipment used by Suzanne Genereux.
10. Raytheon's industrial hygiene policies and practices at facilities other than the Waltham Plant to protect workers against beryllium exposure, including Standard #37-3066-130.
11. Measurements of airborne beryllium particulate at the Waltham Plant.
12. Any OSHA investigation or citation relating to beryllium exposure at the Waltham Plant or at any other Raytheon facility.

13. Beryllium-related injuries to Raytheon workers or other workers at the Waltham Plant or at any other Raytheon facility.
14. Raytheon's knowledge of health risks associated with exposure to beryllium, including acute and chronic beryllium disease.
15. Research and development work by Raytheon concerning, and other consideration given by Raytheon to, possible uses of beryllium or beryllium-containing products in products manufactured or to be manufactured by Raytheon.
16. Information provided to Raytheon by any vendor, government agency, or other person concerning any health risk associated with exposure to beryllium, including acute and chronic beryllium disease.
17. Information provided by Raytheon to any customer, government agency, or other person concerning any health risk associated with exposure to beryllium, including acute and chronic beryllium disease.
18. Information provided by Raytheon to employees at the Waltham Plant, and/or at other Raytheon facilities, concerning any health risk associated with exposure to beryllium, including acute and chronic beryllium disease.
19. Training provided to Raytheon employees at the Waltham Plant, and/or at other Raytheon facilities, regarding workplace procedures or methods for handling beryllium safely and reducing the risk of exposure to beryllium.
20. Raytheon's contacts with Brush, including but not limited to its purchases of Brush products, meetings between Raytheon and Brush personnel, contracts between Raytheon

and Brush, and Brush's provision to Raytheon of Material Safety Data Sheets and any other warning literature or written or oral information relating to beryllium.

21. Raytheon's contacts with American Beryllia Corp., including but not limited to its purchases of American Beryllia Corp. products, meetings between Raytheon and American Beryllia Corp. personnel, contracts between Raytheon and American Beryllia Corp., and American Beryllium Corp.'s provision to Raytheon of Material Safety Data Sheets and any other warning literature or written or oral information, relating to beryllium.
22. Raytheon's contacts with Kyocera America, Inc., including but not limited to its purchases of Kyocera America Inc. products, meetings between Raytheon and Kyocera America, Inc. personnel, contracts between Raytheon and Kyocera America, Inc., and Kyocera America, Inc.'s provision to Raytheon of Material Safety Data Sheets and any other warning literature or written or oral information relating to beryllium.
23. Raytheon's contacts with Kyocera Industrial Ceramics Corp., including but not limited to its purchases of Kyocera Industrial Ceramics Corp. products, meetings between Raytheon and Kyocera Industrial Ceramics Corp. personnel, contracts between Raytheon and Kyocera Industrial Ceramics Corp., and Kyocera Industrial Ceramics Corp.'s provision to Raytheon of Material Safety Data Sheets and any other warning literature or written or oral information relating to beryllium.
24. Raytheon's contacts with Ceradyne or any supplier of beryllium-containing products other than those listed in the preceding four paragraphs, including but not limited to its purchases of the supplier's products, meetings with the supplier's personnel, contracts

with the supplier, and the supplier's provision to Raytheon of Material Safety Data Sheets and other warning literature or written or oral information relating to beryllium.

25. Any medical testing (including but not limited to periodic x-rays) or medical surveillance conducted by Raytheon with respect to persons who worked with or around beryllium at the Waltham Plant.
26. Any medical testing (including but not limited to periodic x-rays) or medical surveillance conducted by Raytheon with respect to persons who worked with or around beryllium at Raytheon facilities other than the Waltham Plant.
27. The identity of Suzanne Genereux's supervisors during her employment at the Waltham plant.
28. The identity of the person(s) having principal responsibility for industrial hygiene at the Waltham Plant when Suzanne Genereux was employed there.
29. The job titles and responsibilities of each of the following Raytheon employees:

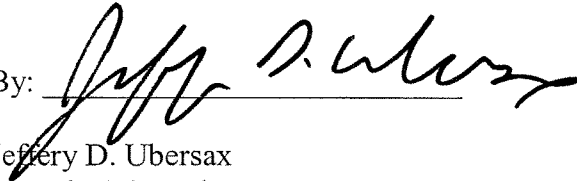
Frank Balint
James McCarthy
Robert Demeo
Leo Myers
Ven Raman
Jim Burns
Bill Hertzmark
John Chartier
Mort Sullivan
Dr. Beverly Shaw
Dr. Peter Toch
Dr. Joe Godrick
Dr. Andros Dalos
Walter Hartford
William Smith
P. Ward

D. Kerman
R.B. Murray
J.E.Breen
A.G. Varanelli
F.P.Ardito
J.A. Isenberg
J. Recesso
R.J. Merrow
A. DerMarderosiam
K.R. Daily

Raytheon is requested to set forth, for each person designated, the matters to which he or she will testify. The deposition will commence at 9:00 a.m. on March 21, 2006, at the offices of Edwards & Angell, LLP, 101 Federal Street, Boston, Massachusetts, and will continue from day to day until completed. The deposition will be videotaped.

Dated: February 10, 2006

Respectfully submitted,

By: 

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